

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA, :  
 :  
 v. : Case No.: 1:14-cr-00306-GBL  
 :  
 JOSE LOPEZ TORRES, :  
 Defendant. :

**MOTION TO ADOPT CO-DEFENDANTS PRETRIAL MOTIONS**

Comes now, the Defendant, JOSE LOPEZ TORRES, by and through counsel and seeks leave of Court to adopt the following pretrial motions filed by his co-defendants:

1. Motion Attorney Conducted Voir Dire (Dkt. #309)
2. Defendant's Motion to Reveal Identity of Confidential Informants (Dkt. #328)
3. Motion to Produce Impeachment Evidence as to Hearsay Declarants (Dkt. #333)
4. Motion for Video Recording of All Foreign Speaking Witnesses (Dkt. #334)
5. Defendant Douglas Duran Cerritos' Motion For A Bill of Particulars (Dkt. #336)
6. Defendant's Motion to Use A Jury Questionnaire (Dkt. #338)
7. Motion For Index of All Recordings/Phone Calls The Government Intends To Use At Trial (Dkt. #348)
8. Defendants Motion to Compel The Government to Disclose Subpoena Returns (Dkt. #350)
9. Motion for Discovery Statements of Co-Conspirators Who Government Does Not Intend to Call At Trial That Are Potentially Imputable to The Defendant If Admitted In Evidence Under The Hearsay Exception of Fed.R.Evid. 801(D)(2)(E) (Dkt. #352)
10. Motion for Immediate Tender of Gigilio Materials (Dkt. #353)
11. Motion For Immediate Tender of 404(B) Materials (Dkt. #355)
12. Motion for Discovery-Designation of Telephone Calls (Dkt. #359)
13. Motion for Exculpatory Evidence-Specific Gang Information (Dkt. #361)
14. Motion to Strike Surplusage (Dkt. #364)
15. Motion for Exculpatory Evidence For Co-Defendants PSIs and Plea Agreements (Dkt. #367)
16. Motion for Leave to File Additional Motions (Dkt. 373)
17. Motion For Additional Preemptory Challenges (Dkt. #375)

I ASK FOR THIS,  
JOSE LOPEZ TORRES,  
By Counsel

\_\_\_\_\_/s/\_\_\_\_\_  
ROBERT L. JENKINS, JR.  
Bynum & Jenkins  
VIRGINIA STATE BAR NO.: 39161  
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**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and accurate copy of the foregoing to be served on all counsel of record via ECF on July 27, 2015.

\_\_\_\_\_/s/\_\_\_\_\_  
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